

EXHIBIT B

Fuad Ateyeh
April 08, 2021

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -X
SHABTAI SCOTT SHATSKY, ET AL.,

Plaintiffs,

Civil No.:
8 CIV. 12355 (MKV)

-against-

THE PALESTINE LIBERATION ORGANIZATION, ET AL.,

Defendants.

- - - - -X

DEPOSITION OF

FUAD ATEYEH

Taken on April 8, 2021

- - - - -X

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<p style="text-align: right;">Page 2</p> <p>1</p> <p>2 I N D E X</p> <p>3 WITNESS EXAMINATION BY PAGE</p> <p>4 FUAD ATEYEH MR. WICK 10</p> <p>5 FUAD ATEYEH MR. BERGER 68</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1</p> <p>2 *****</p> <p>3 VIDEO-RECORDED REALTIME DEPOSITION of FUAD ATEYEH,</p> <p>4 held on April 8, 2021, at 12:32 p.m., was sworn</p> <p>5 before AMBRIA IANAZZI, a Registered Professional</p> <p>6 Reporter, Certified Realtime Reporter, and Notary</p> <p>7 Public.</p> <p>8 *****</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p>1</p> <p>2 (CONT'D)</p> <p>3 I N D E X</p> <p>4 MARKED FOR IDENTIFICATION</p> <p>5 EXHIBIT DESCRIPTION PAGE</p> <p>6 Exhibit 1 Tab 3 13</p> <p>7 Exhibit 2 Tab 4 39</p> <p>8 Exhibit 3 Tab 9 45</p> <p>9 Exhibit 4 Tab 10 48</p> <p>10 Exhibit 5 Tab 8 52</p> <p>11 Exhibit 6 Tab 1 58</p> <p>12 Exhibit 7 Tab 5 63</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1</p> <p>2 A P P E A R A N C E S:</p> <p>3</p> <p>4 COHEN & GRESSER LLP</p> <p>5 Counsel for Plaintiffs</p> <p>6 800 Third Avenue</p> <p>7 New York, New York 10022</p> <p>8</p> <p>9 BY: RONALD F. WICK, ESQ.</p> <p>10 rwick@cohengresser.com</p> <p>11 ERICA LAI, ESQ.</p> <p>12 elai@cohengresser.com</p> <p>13 ANDREW PECORARO, ESQ.</p> <p>14 apecoraro@cohengresser.com</p> <p>15</p> <p>16 SQUIRE PATTON BOGGS</p> <p>17 Attorneys for Defendants</p> <p>18 1211 6th Avenue, 26th Floor</p> <p>19 New York, New York 10036</p> <p>20</p> <p>21 BY: MITCHELL BERGER, ESQ.</p> <p>22 mitchell.berger@squirepb.com</p> <p>23 GASSAN BALOUL, ESQ.</p> <p>24 gassan.baloul@squirepb.com</p> <p>25 JOSEPH ALONZO, ESQ.</p> <p>JOSEPH.ALONZO@squirepb.com</p> <p>SALIM KADOURA, ESQ.</p> <p>salim.kadoura@squirepb.com</p> <p>ROGERS JOSEPH O'DONNELL, PC</p> <p>Counsel for the Witness</p> <p>875 15th Street, Northwest #725</p> <p>Washington, D.C. 20005</p> <p>BY: DEAN PAIK, ESQ.</p>

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<p style="text-align: right;">Page 6</p> <p>1</p> <p>2 (CONT'D)</p> <p>3 A P P E A R A N C E S:</p> <p>4</p> <p>5 ALSO PRESENT:</p> <p>6</p> <p>7 COSETTE VINCENT, Cohen & Gresser</p> <p>8 ELIZABETH BEZVERKHA, Cohen & Gresser</p> <p>9 HADEER AL AMIRI, Interpreter</p> <p>10 COREY WAINAINA, Videographer</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 8</p> <p>1</p> <p>2 THE VIDEOGRAPHER: Good afternoon. We are</p> <p>3 now on the record. The Participants should be</p> <p>4 aware that this proceeding is being recorded, and</p> <p>5 as such, all conversations held will be recorded,</p> <p>6 unless there is a request or agreement to go off</p> <p>7 the record. This is the remote video-recorded</p> <p>8 deposition of Fuad Ateyeh. Today is Thursday,</p> <p>9 April 8th, 2021. The time is now 16:33 UTC Time.</p> <p>10 We are here in the matter of Shatsky</p> <p>11 versus PLO. My name is Corey Wainaina. I am the</p> <p>12 Remote video technician on behalf of U.S. Legal</p> <p>13 Support located at 90 Broad Street, New York, New</p> <p>14 York. I'm not related to any Party in this</p> <p>15 Action, nor am I financially interested in the</p> <p>16 outcome.</p> <p>17 At this time, will the reporter Ambria</p> <p>18 Ianazzi on behalf of U.S. Legal Support please</p> <p>19 enter the statement for remote proceedings into</p> <p>20 the record.</p> <p>21 MR. WICK: Before we begin, just one</p> <p>22 housekeeping measure, I would ask, as we are here</p> <p>23 remotely during the COVID-19 Pandemic, that</p> <p>24 Counsel confirm that we're stipulating, pursuant</p> <p>25 to Rule 29 to the Federal Rules of Civil Procedure</p>
<p style="text-align: right;">Page 7</p> <p>1</p> <p>2 - o o o -</p> <p>3</p> <p>4 H A D E E R A L A M I R I,</p> <p>5 Called as the interpreter in this</p> <p>6 matter, was duly sworn by a Notary Public to</p> <p>7 accurately and faithfully translate the</p> <p>8 questions propounded to the Awni Abu HBDA</p> <p>9 from English into Arabic, and the answers</p> <p>10 given by the Awni Abu HBDA from Arabic into</p> <p>11 English.</p> <p>12</p> <p>13 - o o o -</p> <p>14</p> <p>15 F U A D A T E Y E H,</p> <p>16 The WITNESS herein, after having been</p> <p>17 first duly sworn by a Notary Public, was</p> <p>18 examined and testified through an</p> <p>19 interpreter, in Arabic, as follows:</p> <p>20</p> <p>21 - o o o -</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 9</p> <p>1</p> <p>2 that today's deposition may be taken by</p> <p>3 videoconference, as we're proceeding, and that it</p> <p>4 may be taken before Ms. Ianazzi, who I understand</p> <p>5 is in New York, and the rest of us are scattered</p> <p>6 in different locations; do Counsel agree?</p> <p>7 MR. BERGER: For the Defendants, yes.</p> <p>8 MR. PAIK: For the deponent, yes.</p> <p>9 MR. WICK: Thank you.</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p style="text-align: right;">Page 10</p> <p style="text-align: center;">F. ATEYEH</p> <p>1 EXAMINATION BY</p> <p>2 MR. WICK:</p> <p>3 Q. Good morning, Mr. Ateyeh. Thank you for</p> <p>4 coming today.</p> <p>5 A. Good morning, sir.</p> <p>6 Q. My name is Ron Wick. I'm with the law</p> <p>7 firm of Cohen & Gresser, and I will be asking you</p> <p>8 some questions today. Let me begin by asking you,</p> <p>9 have you ever had your deposition taken before?</p> <p>10 A. Yes.</p> <p>11 Q. On how many occasions?</p> <p>12 A. Twice.</p> <p>13 Q. Great. We may come back to that, but let</p> <p>14 me just go over the process with you. As a</p> <p>15 reminder, the court reporter will be transcribing</p> <p>16 everything we say today. To make sure that the</p> <p>17 record is accurate, and especially since we're</p> <p>18 proceeding by videoconference, it is important that</p> <p>19 you and I, and the other counsel, and our</p> <p>20 interpreter, not speak over each other, so that only</p> <p>21 one person speaks at a time, and I would wait --</p> <p>22 excuse me.</p> <p>23 So, I would ask that you wait until I</p> <p>24 finish my questions before you start to answer, and</p> <p>25</p>	<p style="text-align: right;">Page 12</p> <p style="text-align: center;">F. ATEYEH</p> <p>1 A. Okay.</p> <p>2 Q. Mr. Ateyeh, are you aware of any reason</p> <p>3 why you cannot answer my questions today fully and</p> <p>4 accurately?</p> <p>5 A. No.</p> <p>6 Q. All right. I note that you asked for an</p> <p>7 interpreter today. Mr. Ateyeh, are you fluent in</p> <p>8 Arabic?</p> <p>9 A. Yes.</p> <p>10 Q. And are you also fluent in English? How</p> <p>11 long have you lived in the United States?</p> <p>12 A. So --</p> <p>13 THE INTERPRETER: This is interpreter. I</p> <p>14 want to instruct him in Arabic, also, for his</p> <p>15 answers to be in Arabic, also, instead of English.</p> <p>16 A. Fifty-two years.</p> <p>17 Q. All right. And when you conduct business,</p> <p>18 typically, which language do you use?</p> <p>19 A. English.</p> <p>20 Q. I'm going to be showing you some documents</p> <p>21 during the deposition. We'll be putting them on the</p> <p>22 screen, and we will show you as much of the document</p> <p>23 as you need to see. If there's something else in</p> <p>24 the document you would like to see, you and your</p> <p>25</p>
<p style="text-align: right;">Page 11</p> <p style="text-align: center;">F. ATEYEH</p> <p>1 I will, in turn, try to wait until you finish before</p> <p>2 I ask another question.</p> <p>3 And it is also important, given that we do</p> <p>4 have a court reporter taking down everything that we</p> <p>5 say, for you to respond to questions verbally. For</p> <p>6 example, nodding your head is something that can't</p> <p>7 be transcribed.</p> <p>8 And if you don't understand one of my</p> <p>9 questions, please let me know, and I will try and</p> <p>10 rephrase it for you. If you do answer a question, I</p> <p>11 will assume that you understood it; okay?</p> <p>12 Your counsel and other counsel here may</p> <p>13 object to my questions. Unless your counsel</p> <p>14 instructs you not to answer a question, you should</p> <p>15 go ahead and answer my question, even though there</p> <p>16 was an objection; is that understood?</p> <p>17 And lastly, I hope we won't be going for</p> <p>18 too long today, but we may take periodic breaks</p> <p>19 during the deposition. If you need a break at any</p> <p>20 time, please let your attorney know, or let me know,</p> <p>21 and we'll do our best to accommodate your request.</p> <p>22 My one request is that if I've asked you a</p> <p>23 question, I would ask that you answer the question</p> <p>24 before we take the break; is that all right?</p> <p>25</p>	<p style="text-align: right;">Page 13</p> <p style="text-align: center;">F. ATEYEH</p> <p>1 counsel could just let us know, and we'll be happy</p> <p>2 to move the document around and show you whatever it</p> <p>3 is. And I'm going to do that now.</p> <p>4 MR. WICK: And could we put up Tab 3,</p> <p>5 please.</p> <p>6 MS. VINCENT: Yes.</p> <p>7 (Whereupon, Tab 3 was marked as Exhibit 1 for</p> <p>8 identification, as of April 8th, 2021.)</p> <p>9 Q. Can you see that, Mr. Ateyeh? What we're</p> <p>10 showing you right now is a copy of a Subpoena from a</p> <p>11 Court that's commanding you to appear at a</p> <p>12 deposition today. Go ahead.</p> <p>13 Have you received a copy of the Subpoena?</p> <p>14 Mr. Ateyeh, because you've requested an</p> <p>15 interpreter, and he's translating my questions in</p> <p>16 Arabic, you need to answer in Arabic, and have him</p> <p>17 translated back to me.</p> <p>18 Q. And to be clear, do you understand,</p> <p>19 Mr. Ateyeh?</p> <p>20 A. Yes.</p> <p>21 Q. Okay.</p> <p>22 THE INTERPRETER: This is interpreter. I</p> <p>23 asked him if he received a copy of the Subpoena</p> <p>24 and the answer was yes.</p> <p>25</p>

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<p style="text-align: right;">Page 14</p> <p style="text-align: center;">F. ATEYEH</p> <p>1 Q. All right. And is it your understanding</p> <p>2 that you are testifying today pursuant to the</p> <p>3 Subpoena?</p> <p>4 A. Yes.</p> <p>5 Q. Did you do anything to prepare for your</p> <p>6 deposition today?</p> <p>7 A. Yes.</p> <p>8 Q. What did you do?</p> <p>9 MR. PAIK: So, we're not talking about</p> <p>10 meeting with the lawyer, or anything that</p> <p>11 Mr. Ateyeh and I spoke about.</p> <p>12 Q. Other than speaking with your lawyer,</p> <p>13 Mr. Ateyeh, what did you do to prepare for your</p> <p>14 deposition today?</p> <p>15 A. I was asked to search or look for some</p> <p>16 papers, and I was trying to locate them and give</p> <p>17 them to my attorney.</p> <p>18 Q. Okay. Did you meet with anybody, or</p> <p>19 discuss your deposition, or your testimony today</p> <p>20 with anybody other than your attorney?</p> <p>21 A. Yes.</p> <p>22 Q. Who else did you meet with?</p> <p>23 A. With my wife.</p> <p>24 Q. Anyone other than your wife?</p> <p>25</p>	<p style="text-align: right;">Page 16</p> <p style="text-align: center;">F. ATEYEH</p> <p>1 interpret it first?</p> <p>2 THE INTERPRETER: I will interpret it.</p> <p>3 MR. PAIK: Okay. I'm going to object, and</p> <p>4 on attorney-client privilege grounds, and instruct</p> <p>5 the Witness not to answer.</p> <p>6 MR. WICK: On attorney-client privilege</p> <p>7 grounds?</p> <p>8 MR. PAIK: Yes.</p> <p>9 MR. WICK: Who paying his bills?</p> <p>10 MR. PAIK: I mean, you could do whatever</p> <p>11 you feel is appropriate. That's the objection,</p> <p>12 and that's the instruction. I would also add that</p> <p>13 it's not relevant. I don't see how he's paying</p> <p>14 his fees is relevant to, or makes the -- somehow</p> <p>15 objects -- the Palestinian Authority to -- in the</p> <p>16 United States.</p> <p>17 MR. WICK: Well, I appreciate that. Of</p> <p>18 course, relevance is not a basis to object. I'll</p> <p>19 ask a different question.</p> <p>20 Q. Is the Palestinian Authority paying your</p> <p>21 legal bills in connection with this matter?</p> <p>22 MR. PAIK: Go ahead. I'm sorry. Okay.</p> <p>23 Same objection, same instruction.</p> <p>24 Q. And are you going to follow your</p> <p>25</p>
<p style="text-align: right;">Page 15</p> <p style="text-align: center;">F. ATEYEH</p> <p>1 A. No.</p> <p>2 Q. And prior to your deposition today, have</p> <p>3 you ever had any communications with the counsel for</p> <p>4 the Defendants, who is here today, Mr. Mitch Berger?</p> <p>5 A. No.</p> <p>6 Q. And have you ever had any communications</p> <p>7 with Mr. Berger's colleague Gassan Baloul?</p> <p>8 A. No.</p> <p>9 Q. And have you ever had any communications</p> <p>10 with anybody else at the Defendant's law firm of</p> <p>11 Squire, Patton, Boggs?</p> <p>12 A. No.</p> <p>13 Q. And your attorney, Mr. Paik, did you know</p> <p>14 Mr. Paik before you received the Subpoena?</p> <p>15 A. No.</p> <p>16 Q. And how did you get in contact with</p> <p>17 Mr. Paik?</p> <p>18 MR. PAIK: I'm sorry, can you answer in</p> <p>19 Arabic, please?</p> <p>20 A. A family friend recommended him.</p> <p>21 Q. And is anyone, other than you, paying his</p> <p>22 legal bills for this matter?</p> <p>23 MR. PAIK: Objection.</p> <p>24 Can I object first, or do you want to</p> <p>25</p>	<p style="text-align: right;">Page 17</p> <p style="text-align: center;">F. ATEYEH</p> <p>1 attorney's instruction, Mr. Ateyeh?</p> <p>2 A. Yes.</p> <p>3 Q. And is anyone from the Palestinian</p> <p>4 Liberation Authority -- correction.</p> <p>5 Is the Palestinian Liberation Organization</p> <p>6 paying your legal bills in connection with this</p> <p>7 matter?</p> <p>8 MR. PAIK: Okay. Objection -- same</p> <p>9 objection, same instruction.</p> <p>10 Q. And Mr. Ateyeh, are you going to follow</p> <p>11 your attorney's instruction not to answer my</p> <p>12 question?</p> <p>13 A. Yes.</p> <p>14 Q. Mr. Ateyeh, you, I believe, testified a</p> <p>15 moment ago that you have had your deposition taken</p> <p>16 on two previous occasions; is that correct?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Let's start with the most recent one.</p> <p>19 When was that?</p> <p>20 A. 2012, I think.</p> <p>21 Q. And what type of case was that in</p> <p>22 connection with?</p> <p>23 MR. PAIK: Use the interpreter, please.</p> <p>24 A. One of the tenants who was renting claimed</p> <p>25</p>

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<p style="text-align: right;">Page 18</p> <p>1 F. ATEYEH</p> <p>2 that -- there was a fire, and she claimed that she</p> <p>3 was affected by that fire, and she filed a claim</p> <p>4 against me for personal injury.</p> <p>5 Q. She was a residential tenant of yours?</p> <p>6 A. Yes, sir.</p> <p>7 Q. And what about the other occasion in which</p> <p>8 you were deposed; when was that?</p> <p>9 A. Maybe 2005.</p> <p>10 Q. And what type of case was that?</p> <p>11 A. One person lended money for me, asked me</p> <p>12 for money. I lent him money. He never gave it back</p> <p>13 to me, so I sued him.</p> <p>14 Q. You were recovering on a personal loan?</p> <p>15 MR. PAIK: Excuse me, I'm going to object</p> <p>16 as to outside the basis of reasonable scope for</p> <p>17 the jurisdiction of discovery. You've got your</p> <p>18 answer for the basis of the deposition; would you</p> <p>19 move on?</p> <p>20 Q. You could answer, Mr. Ateyeh.</p> <p>21 A. Was the question; did I get my money or</p> <p>22 not?</p> <p>23 Q. No. I just wanted to clarify that the</p> <p>24 nature of the case was you were seeking to recover</p> <p>25 on a personal loan?</p>	<p style="text-align: right;">Page 20</p> <p>1 F. ATEYEH</p> <p>2 Q. Are you licensed in any other</p> <p>3 jurisdictions?</p> <p>4 A. No.</p> <p>5 Q. And do you offer your notary public</p> <p>6 services individually or through one of your</p> <p>7 businesses?</p> <p>8 MR. PAIK: Objection, it assumes he has</p> <p>9 businesses.</p> <p>10 Q. You can answer, if you understand the</p> <p>11 question.</p> <p>12 A. I don't know what is the difference. I</p> <p>13 have a business, and I do the notarization. I don't</p> <p>14 know what is the connection.</p> <p>15 Q. Is your business -- strike that.</p> <p>16 What's the name of your business?</p> <p>17 A. Fred's Liquor.</p> <p>18 Q. I'm sorry, Fred's Liquor?</p> <p>19 A. Liquor.</p> <p>20 Q. And that business sells liquor?</p> <p>21 A. Yes.</p> <p>22 Q. And Fred's Liquor also offers notary</p> <p>23 public services?</p> <p>24 A. No.</p> <p>25 Q. Okay. Do you have a business that offers</p>
<p style="text-align: right;">Page 19</p> <p>1 F. ATEYEH</p> <p>2 A. Yes.</p> <p>3 Q. And have you ever testified in court?</p> <p>4 A. Yes. Yes.</p> <p>5 Q. On how many occasions?</p> <p>6 A. I think once.</p> <p>7 Q. And was it in either of the two cases that</p> <p>8 you just discussed?</p> <p>9 THE INTERPRETER: This is interpreter.</p> <p>10 He's asking me to repeat the question. I will.</p> <p>11 A. Are you referring to the case where I lent</p> <p>12 someone money, and I filed a claim against him?</p> <p>13 Q. All right. So, that was the same case</p> <p>14 where you had your deposition taken, and -- in,</p> <p>15 approximately, 2005?</p> <p>16 A. Yes.</p> <p>17 Q. Great.</p> <p>18 MR. WICK: And to make it easier,</p> <p>19 Elizabeth, I think we could take that document</p> <p>20 down. Thank you.</p> <p>21 Q. Mr. Ateyeh, are you a licensed notary</p> <p>22 public?</p> <p>23 A. Yes.</p> <p>24 Q. Where are you licensed?</p> <p>25 A. In the State of California.</p>	<p style="text-align: right;">Page 21</p> <p>1 F. ATEYEH</p> <p>2 notary public services?</p> <p>3 A. No.</p> <p>4 Q. But you offer notary public services</p> <p>5 yourself?</p> <p>6 A. Yes.</p> <p>7 Q. Do you have any other notary publics that</p> <p>8 work for you?</p> <p>9 A. No.</p> <p>10 Q. And for what types of clients do you</p> <p>11 particularly -- that's not a good question. Let me</p> <p>12 try to rephrase that.</p> <p>13 Are your notary services primarily used by</p> <p>14 individuals, as opposed to companies, or</p> <p>15 organizations?</p> <p>16 A. Whomever calls me, I notarize it for him.</p> <p>17 Q. Are there particular types of documents</p> <p>18 that you hold yourself out as a specialty of yours</p> <p>19 in notarizing?</p> <p>20 A. No.</p> <p>21 Q. Are there particular types of clients that</p> <p>22 you advertise your services to?</p> <p>23 MR. PAIK: Objection, assumes he</p> <p>24 advertises.</p> <p>25 Q. You may answer.</p>

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<p style="text-align: right;">Page 22</p> <p>F. ATEYEH</p> <p>A. I do not advertise. I'm sorry for that.</p> <p>Q. Approximately, how many documents do you notarize per year?</p> <p>A. I cannot tell you the exact number, but maybe 30, 20; I don't know exactly.</p> <p>Q. Is it fair to say that your notary services are not a significant portion of your income?</p> <p>A. I want to explain to you that this service, I do it as a favor for the community, other than to gain money for it.</p> <p>Q. Do you charge for your notary services?</p> <p>A. Yes.</p> <p>Q. And, approximately, what percent of your notary clients would you say are Palestinian American?</p> <p>A. A high percentage, most of them.</p> <p>Q. All right. And do you have notary clients outside of the United States?</p> <p>A. No.</p> <p>MR. PAIK: Objection, ambiguous.</p> <p>MR. WICK: I'll rephrase it.</p> <p>Q. Do you have notary clients who reside outside of the United States?</p>	<p style="text-align: right;">Page 24</p> <p>F. ATEYEH</p> <p>Mission a client of yours?</p> <p>A. No.</p> <p>Q. Have you ever provided any notary services for the Palestinian Authority?</p> <p>A. No.</p> <p>Q. Have you ever provided any notary services for the PLO?</p> <p>A. No.</p> <p>Q. And have you ever provided any notary services for anyone that you knew to be an official or an employee of either the Palestinian Authority or the PLO?</p> <p>A. No.</p> <p>Q. Have you ever provided any consular services for the Palestinian Authority or the PLO?</p> <p>MR. PAIK: Object to the form of the question. It's ambiguous. I don't know what you mean by, "consular services."</p> <p>MR. BERGER: I join in that objection.</p> <p>MR. WICK: Please go ahead and interpret the question, and I would like an answer.</p> <p>A. No.</p> <p>Q. In providing your notary services, do you have occasion to notarize or certify any official</p>
<p style="text-align: right;">Page 23</p> <p>F. ATEYEH</p> <p>A. No.</p> <p>Q. Is the Palestinian Authority a client of yours?</p> <p>A. No.</p> <p>Q. Is the Palestinian Liberation Organization a client of yours?</p> <p>A. No.</p> <p>Q. And just for shorthand, during the deposition, I will use the acronym, "PLO," to refer to the Palestinian Liberation Organization; is that okay?</p> <p>A. Yes.</p> <p>Q. To the best of your knowledge, does anybody who works for the Palestinian Authority -- excuse me.</p> <p>To the best of your knowledge, is anyone who works for the Palestinian Authority a client of yours?</p> <p>A. No.</p> <p>Q. And to the best of your knowledge, is anybody who works for the PLO a client of yours?</p> <p>A. No.</p> <p>Q. And to the best of your knowledge, is anybody who works at the Palestinian United Nations</p>	<p style="text-align: right;">Page 25</p> <p>F. ATEYEH</p> <p>documents of either the Palestinian Authority or the PLO?</p> <p>A. No.</p> <p>Q. Do you have occasion to notarize or certify documents for use in Palestinian legal proceedings?</p> <p>MR. PAIK: Objection. Sorry. Go ahead.</p> <p>MR. BERGER: Objection, compound question.</p> <p>Q. You may answer.</p> <p>A. I don't understand exactly what you are referring to.</p> <p>Q. Have you ever had occasion to -- let me strike that.</p> <p>Are you occasionally asked to notarize a document that is intended to be used in a -- in a legal proceeding in Palestinian?</p> <p>A. No.</p> <p>Q. Give me just a moment, please.</p> <p>Do you have any agreement with the Palestinian Authority who provide any services in the United States?</p> <p>MR. PAIK: Objection; indifferent as to time.</p> <p>MR. WICK: To be clear, I'll rephrase the</p>

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<p style="text-align: right;">Page 26</p> <p>F. ATEYEH</p> <p>question.</p> <p>Q. Do you currently have any agreement with the Palestinian Authority to be able to provide services in the United States?</p> <p>A. No.</p> <p>Q. Have you ever had such an agreement?</p> <p>A. What agreement exactly are you referring to?</p> <p>Q. Have you ever had any agreement of any kind with the Palestinian Authority to provide services to individuals in the United States?</p> <p>MR. PAIK: Objection. Services of any kind?</p> <p>MR. WICK: Correct.</p> <p>A. No, I don't have any agreement.</p> <p>Q. Have you ever had any agreement with the Palestinian Authority to provide services in the United States?</p> <p>A. No, but I didn't even understand; what do you mean by, "the agreement"?</p> <p>Q. Do you understand what an agreement is?</p> <p>A. Yes.</p> <p>Q. Okay. I'm asking about whether you've ever had an agreement of any kind with the</p>	<p style="text-align: right;">Page 28</p> <p>F. ATEYEH</p> <p>Q. And do you have an understanding that the Washington, D.C. office of the PLO used to provide services that could be characterized as consular services?</p> <p>MR. PAIK: Objection, lacks foundation. If the Witness even understands what consular services are.</p> <p>MR. WICK: Let me stop real quick for a second because I realized I forgot to do something very important, which is plug my laptop in, and it's about to die.</p> <p>THE VIDEOGRAPHER: Do you want to go off the record?</p> <p>MR. WICK: Okay. Yes. Could we go off the record for a minute, please.</p> <p>THE VIDEOGRAPHER: Okay. We are now off the record. The time is 17:14 UTC Time. (Whereupon, a short recess was taken.)</p> <p>THE VIDEOGRAPHER: We are now back on the record. The time is 17:16 UTC Time.</p> <p>MR. WICK: Thank you.</p> <p>Q. And before I was interrupted, Mr. Ateyeh, there was an objection to my question, so I'm going to ask you a different one. Were you aware of any</p>
<p style="text-align: right;">Page 27</p> <p>F. ATEYEH</p> <p>Palestinian Authority that have to do with you providing services in the United States?</p> <p>A. No.</p> <p>Q. Same question for the PLO. Have you ever had an agreement with the PLO to provide any kind of services in the United States?</p> <p>A. No.</p> <p>Q. And do you hold any licenses that have been granted by the Palestinian Authority?</p> <p>A. No.</p> <p>Q. Do you hold any licenses that have been granted by the PLO?</p> <p>A. No.</p> <p>Q. Are you aware that the PLO used to have an office in Washington, D.C.?</p> <p>A. Yes.</p> <p>Q. And do you know what happened to that office?</p> <p>A. Yes.</p> <p>Q. What's your understanding of what happened to that office?</p> <p>MR. PAIK: In Arabic, please.</p> <p>A. I understand it's closed now. The office is closed now.</p>	<p style="text-align: right;">Page 29</p> <p>F. ATEYEH</p> <p>services that the PLO D.C. offices provided, before it closed?</p> <p>A. I don't know.</p> <p>Q. All right. Do you know what the D.C. office did?</p> <p>A. I don't know.</p> <p>Q. Do you have any understanding as to whether the D.C. office certified documents for use in certain legal proceedings?</p> <p>MR. PAIK: Objection, asked and answered.</p> <p>Q. Please answer the question.</p> <p>A. Let me answer. Maybe it's not straight answer, but I don't know what they do exactly in that office. The only thing I know is that I send them the authorization, and they sign it, and send it back; this is what I know.</p> <p>Q. What authorization would you send them?</p> <p>A. I send them -- because they sign it. I don't know what they do it with, but they sign it.</p> <p>Q. Why would you have occasion to send papers to the PLO's D.C. office?</p> <p>THE INTERPRETER: I'm sorry.</p> <p>MR. PAIK: Objection. Can he have a time-period?</p>

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<p style="text-align: right;">Page 30</p> <p>1 F. ATEYEH</p> <p>2 MR. WICK: I'm working off the Witness's</p> <p>3 answer, but if you'd like to clarify, certainly.</p> <p>4 Let's step back.</p> <p>5 Q. On occasion, you would send papers to the</p> <p>6 D.C. -- to the PLO's D.C. office, correct?</p> <p>7 A. Yes. To be specific, the authorization I</p> <p>8 do; yes.</p> <p>9 Q. And over what --</p> <p>10 MR. BERGER: Excuse me, we have an</p> <p>11 objection to the translation. Our translator says</p> <p>12 the word he is using is, "Power of Attorney," not</p> <p>13 authorization.</p> <p>14 MR. WICK: Okay.</p> <p>15 Q. The papers that you're describing, without</p> <p>16 characterizing them, over what time-period would you</p> <p>17 send papers to the PLO's Washington, D.C. office?</p> <p>18 A. I didn't understand the question to answer</p> <p>19 it correctly. So, when you say, "timeframe," do you</p> <p>20 mean how long for these documents to take, or what</p> <p>21 do you mean by, "timeframe," exactly?</p> <p>22 Q. I mean the dates on which you would have</p> <p>23 occasion to interact with the PLO's D.C. office;</p> <p>24 from what year to what year, approximately?</p> <p>25 A. From 2012 up until they closed.</p>	<p style="text-align: right;">Page 32</p> <p>1 F. ATEYEH</p> <p>2 Q. And why would the PLO's Washington, D.C.</p> <p>3 office need that document, after you had notarized</p> <p>4 it?</p> <p>5 MR. PAIK: Objection, calls for</p> <p>6 speculation. And, also, objection, assumes facts</p> <p>7 not in evidence.</p> <p>8 Q. You may answer. Please answer in Arabic.</p> <p>9 A. So, first of all, the question is not</p> <p>10 clear. Secondly, I'm just a notary public. I have</p> <p>11 already notarized -- I notarize the papers, the</p> <p>12 Power of Attorneys, but I don't have any authority</p> <p>13 to sign on their behalf.</p> <p>14 Q. I understand. There's a process here that</p> <p>15 I'm not understanding, and I'm hoping you can save a</p> <p>16 little bit of time. If you could explain it, what</p> <p>17 the connection is between your client and you, and</p> <p>18 the PLO's Washington, D.C. office. So, if I</p> <p>19 understand it --</p> <p>20 THE INTERPRETER: Sorry. Continue.</p> <p>21 Q. And so my question is, why did you send</p> <p>22 documents that you had notarized to the PLO, rather</p> <p>23 than just giving them back to your client?</p> <p>24 A. Now, your question is slightly more -- to</p> <p>25 answer it. So, the customer comes, and they sign,</p>
<p style="text-align: right;">Page 31</p> <p>1 F. ATEYEH</p> <p>2 Q. I'm sorry, from 2012 until?</p> <p>3 A. Until the office was closed.</p> <p>4 Q. Okay. Thank you. And since we seem to</p> <p>5 have a disagreement about what these papers were</p> <p>6 called, can you describe them for me, please?</p> <p>7 A. So, the Power -- the papers that I service</p> <p>8 are Power of Attorneys that we sign and send to the</p> <p>9 attorneys, and there's two types of Power of</p> <p>10 Attorneys; there's the general Power of Attorney,</p> <p>11 and the specific one for selling property, or</p> <p>12 selling a land.</p> <p>13 Q. And why would you send Powers of Attorney</p> <p>14 to the -- to the PLO's Washington, D.C. office?</p> <p>15 A. They either come to me to sign the deal or</p> <p>16 go directly. They are to sign it, so I help the --</p> <p>17 the community to sign it.</p> <p>18 Q. So, this is a -- are these documents that</p> <p>19 you would notarize for one of your clients?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And why would you -- after you've</p> <p>22 notarized a Power of -- strike that.</p> <p>23 So, you would notarize a Power of Attorney</p> <p>24 for one of your clients, correct?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 33</p> <p>1 F. ATEYEH</p> <p>2 and I notarize the document, and either I take their</p> <p>3 document, or Power of Attorney, and take it</p> <p>4 themselves to the office in Washington, D.C., or I</p> <p>5 take it myself, and send it, and get it back.</p> <p>6 About 50 percent of the Power of Attorney,</p> <p>7 the individuals take it themselves, and I never see</p> <p>8 them again, and the other part, I send it to the</p> <p>9 office, and they send it back to me. I hope that</p> <p>10 this answers your question.</p> <p>11 Q. I'm starting to understand. So, why</p> <p>12 would --</p> <p>13 You said that for about 50 percent you</p> <p>14 would send the document to the PLO, and they would</p> <p>15 send it back to you. Would the PLO do something</p> <p>16 with that document before sending it back?</p> <p>17 MR. BERGER: Objection, this is</p> <p>18 Mr. Berger. I'm identifying myself because the</p> <p>19 record has me down as Mr. Paik. I object to the</p> <p>20 ambiguity of the question. You should be -- PLO,</p> <p>21 it should be clear on the record, the PLO Mission</p> <p>22 of the United States, not the PLO elsewhere.</p> <p>23 MR. WICK: I am referring to the PLO's</p> <p>24 Washington, D.C. office, which I understood to be</p> <p>25 an office of the PLO, but if that creates an</p>

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<p style="text-align: right;">Page 34</p> <p>1 F. ATEYEH</p> <p>2 ambiguity, I'm happy to refer to it as the</p> <p>3 Washington, D.C. office. The Witness may answer.</p> <p>4 THE INTERPRETER: Could you please read</p> <p>5 the question again, if you don't mind.</p> <p>6 MR. WICK: I'll re-ask the question.</p> <p>7 Q. You referred a moment ago to sending</p> <p>8 documents to the PLO's Washington, D.C. office, and</p> <p>9 then sending the document back to you.</p> <p>10 My question is, what would the PLO's</p> <p>11 Washington, D.C. office do with that document,</p> <p>12 before sending it back to you?</p> <p>13 A. Yes, I know they stamp it with the</p> <p>14 Embassy's stamp, and they send it back to me, and I</p> <p>15 give it back to the client.</p> <p>16 Q. Okay. And does that stamp convey some</p> <p>17 sort of authorization or approval from the PLO?</p> <p>18 MR. PAIK: Objection, calls for</p> <p>19 speculation.</p> <p>20 MR. WICK: The Witness may answer.</p> <p>21 MR. PAIK: Objection. This is Paik. I</p> <p>22 think that also calls for a legal conclusion, what</p> <p>23 the Witness --</p> <p>24 Q. Mr. Ateyeh, you may answer.</p> <p>25 A. When they sign it and send it back to us,</p>	<p style="text-align: right;">Page 36</p> <p>1 F. ATEYEH</p> <p>2 you've just described, is it your understanding that</p> <p>3 stamping documents, or attesting to documents for</p> <p>4 use in Palestine was a service that was provided by</p> <p>5 the PLO's Washington, D.C. office?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Are you aware of any other services</p> <p>8 that the PLO's Washington, D.C. office offered?</p> <p>9 A. No.</p> <p>10 Q. Do you have any awareness of whether the</p> <p>11 PLO's Washington, D.C. office offered notary</p> <p>12 services?</p> <p>13 A. Yes.</p> <p>14 Q. And to be clear, is it your understanding</p> <p>15 that the PLO's Washington, D.C. office offered</p> <p>16 notary services?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And to your knowledge, did the</p> <p>19 PLO's Washington, D.C. office enter into contracts</p> <p>20 with individual notaries to offer notary services?</p> <p>21 A. I don't know.</p> <p>22 Q. To your knowledge, did the PLO's</p> <p>23 Washington, D.C. office ever refer individuals to</p> <p>24 you, or recommend that they get documents certified</p> <p>25 by you?</p>
<p style="text-align: right;">Page 35</p> <p>1 F. ATEYEH</p> <p>2 it becomes a valid document for us.</p> <p>3 Q. Okay. And when you say, "a valid</p> <p>4 document," is it your understanding that it's a</p> <p>5 valid document under Palestinian law?</p> <p>6 MR. BERGER: Objection, calls for a legal</p> <p>7 conclusion. This is -- calls for a legal</p> <p>8 conclusion.</p> <p>9 Objection, this is also Berger. It's</p> <p>10 leading, and this is a non-party witness.</p> <p>11 Q. You may answer.</p> <p>12 A. I don't know what happens to this document</p> <p>13 after I receive it. I give it to them, and I don't</p> <p>14 know what happens to it.</p> <p>15 Q. I understand. What did you mean when you</p> <p>16 said, "it becomes a valid document after it's</p> <p>17 stamped"?</p> <p>18 A. My clients send it to the authorize person</p> <p>19 in Palestinian to use it.</p> <p>20 Q. Okay. So, the documents that you would</p> <p>21 send to be stamped by the PLO's Washington, D.C.</p> <p>22 office were typically documents that your clients</p> <p>23 intended to send to Palestine for use there?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And based on the practice that</p>	<p style="text-align: right;">Page 37</p> <p>1 F. ATEYEH</p> <p>2 A. I don't know who sends the clients. I</p> <p>3 don't know.</p> <p>4 Q. So, to be clear, you're not aware of the</p> <p>5 PLO's Washington, D.C. office ever recommending or</p> <p>6 referring a client to you?</p> <p>7 MR. PAIK: Objection, asked and answered.</p> <p>8 You may answer.</p> <p>9 A. Let me clear the picture more. When a</p> <p>10 client comes to me, I want -- I don't ask the</p> <p>11 client, "who sent you? Where did you come from?"</p> <p>12 Q. I understand that you don't ask the</p> <p>13 client. My question is a little bit different, but</p> <p>14 it's a direct question.</p> <p>15 Do you have any knowledge or awareness</p> <p>16 that the Washington, D.C. of the PLO ever</p> <p>17 recommended or referred a client to you?</p> <p>18 MR. PAIK: Objection, asked and answered.</p> <p>19 A. Again, I will answer you again. Really, I</p> <p>20 don't know.</p> <p>21 Q. Okay. And do you have any awareness or</p> <p>22 knowledge that the Palestinian Authority ever</p> <p>23 recommended or referred a client to you?</p> <p>24 A. No.</p> <p>25 Q. Okay.</p>

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<p style="text-align: right;">Page 38</p> <p>F. ATEYEH</p> <p>MR. WICK: Elizabeth, could we go to Tab D, please, or Tab 4. Excuse me.</p> <p>MS. BEZVERKHA: Sorry. Just a moment.</p> <p>MR. PAIK: Sorry. Do you mind if we take a break while -- I think we've been going for more than an hour.</p> <p>MR. WICK: That's fine with me.</p> <p>THE VIDEOGRAPHER: Okay. We are now off the record. The time is 17:39 UTC Time.</p> <p>(Whereupon, a short recess was taken.)</p> <p>THE VIDEOGRAPHER: We are now back on the record. The time is 17:51 UTC.</p> <p>MR. WICK: Thank you.</p> <p>Q. Mr. Ateyeh, I was about to show you a document, but before I do so, maybe I'll just -- to avoid it, are you aware of having been -- ever having your name or contact information on a website affiliated with the PLO regarding your notary services?</p> <p>A. Yes, from the clients.</p> <p>Q. I don't understand your answer. What do you mean by, "from the clients"?</p> <p>A. Yes, when a client comes to me, he tells me that he got my name and contact from the Website.</p>	<p style="text-align: right;">Page 40</p> <p>F. ATEYEH</p> <p>Yes; do you see that?</p> <p>A. Yes.</p> <p>Q. All right. If we go back up to the first page, you'll see that there's a section in the middle of the page called, "notary publics"; do you see that?</p> <p>A. Yes, sir.</p> <p>Q. Okay.</p> <p>MR. WICK: And Elizabeth, could you scroll down? It's going to be about seven or eight pages to that section. It's going to be several pages down.</p> <p>Q. And while she is scrolling, I'm going to ask you, Mr. Ateyeh, are you familiar with that Website?</p> <p>A. No.</p> <p>Q. Okay. All right. So, this page is from the Notary Public section of that Website, and you will see that there is a list of tabs associated with various cities; do you see that?</p> <p>A. It's not clear.</p> <p>Q. You mean the document isn't clear? You can't read it clearly?</p> <p>A. I can't see it even. I don't know. Now I</p>
<p style="text-align: right;">Page 39</p> <p>F. ATEYEH</p> <p>Q. Okay. And do you understand that Website to be a Website of the PLO?</p> <p>A. It's not the PLO.</p> <p>Q. Okay. Let's look at Tab 4.</p> <p>A. Okay.</p> <p>Q. We're going to show you a document. Mr. Ateyeh, this is a printout from a Website. You'll see at the -- at the top of the Website, it says, "PLO General Delegation to the United States."</p> <p>(Whereupon, Tab 4 was marked as Exhibit 2 for identification, as of April 8th, 2021.)</p> <p>MR. WICK: Can you zoom in a little bit on that, so we could see the heading, and can we zoom in on that?</p> <p>Q. There we go. You see the heading, "PLO General Delegation to the United States"?</p> <p>A. Yes.</p> <p>Q. Okay. And to -- to not mislead, this is not a current web page.</p> <p>MR. WICK: Elizabeth, can you scroll down to the bottom of the page. A little more. All the way to the bottom. There we go.</p> <p>Q. You'll see the date at the very bottom, it's timestamped March 18th, 2019; do you see that?</p>	<p style="text-align: right;">Page 41</p> <p>F. ATEYEH</p> <p>can see it.</p> <p>Q. Okay. Do you see your name listed on the page?</p> <p>A. Yes.</p> <p>Q. All right. Do you know how you came -- how your name came to be listed on this page?</p> <p>A. First of all, I haven't seen this page my whole life. Second thing, I am a well-known and trusted person in the community.</p> <p>MR. PAIK: This is Paik. Can I move to strike everything after, "second"?</p> <p>MR. WICK: I'm sorry?</p> <p>MR. PAIK: Move to strike everything after, "second," as nonresponsive.</p> <p>MR. WICK: You're certainly free to state your motion for the record.</p> <p>MR. PAIK: What? Sorry, I didn't catch that. The second part of the answer wasn't responsive to the question, so I just move to strike it.</p> <p>MR. WICK: And your motion is noted.</p> <p>Q. So, I'm going to ask the question again. Mr. Ateyeh, do you know how your name came to be listed on this page?</p>

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<p style="text-align: right;">Page 42</p> <p>F. ATEYEH</p> <p>A. I have been doing the Notary Public through the State of California for ten years, and I expect for it to be popular among people.</p> <p>Q. Do you know who put your name on the page?</p> <p>A. No, and I've never seen this page.</p> <p>Q. Did anyone at the PLO or the Palestinian Authority ever ask you for permission to list you as a Notary Public on their Website?</p> <p>A. No.</p> <p>Q. And I want to be clear on this, although I've asked you similar questions before; have you ever had any financial or business arrangement with the Washington, D.C. office of the PLO?</p> <p>Since the Washington, D.C. office closed, do you know whether the Palestinian Authority, or PLO has established a list of recommended Notary Publics in the United States?</p> <p>A. I know there is a list of names available and my name is one of them.</p> <p>Q. Do you know where a person could find that list?</p> <p>A. You know, I've never seen this myself.</p> <p>Q. How do you know that your name is on it?</p> <p>A. The people tell me that.</p>	<p style="text-align: right;">Page 44</p> <p>F. ATEYEH</p> <p>Authority or the PLO?</p> <p>A. No.</p> <p>Q. You described a little while ago a process by which you notarize documents for use in Palestine. Do you also notarize documents for other purposes, or have all of the documents you've notarized been for use in Palestine?</p> <p>MR. PAIK: Object to the portion of the question, to the extent it attempts to summarize parts of the answer.</p> <p>MR. WICK: You may answer.</p> <p>A. So, I'm a Notary Public in the State of California, and my office is open to any person who comes to notarize their document. Yes, high percentages from Palestine, but not all of my customers or clients are Palestinians.</p> <p>Q. I'm going to ask you to estimate, during the last 12 months, approximately, what percentage of the documents that you have notarized were documents that were notarized for use in Palestine?</p> <p>A. Most of them.</p> <p>Q. More than 75 percent?</p> <p>A. Yes.</p> <p>Q. More than 90 percent?</p>
<p style="text-align: right;">Page 43</p> <p>F. ATEYEH</p> <p>Q. Which people?</p> <p>A. The clients who comes to sign their papers.</p> <p>Q. To your knowledge, do some of these clients find out about you and your services from that list?</p> <p>A. Very few of them, but most of them, most of the clients knows that I'm a Notary Public in San Francisco.</p> <p>Q. Have you ever had a conversation with anybody at the Palestinian Authority or the PLO about having your name on that list?</p> <p>A. No.</p> <p>Q. And have you ever received any compensation from the Palestinian Authority or for the PLO for being on that list?</p> <p>A. No.</p> <p>Q. And have you ever received any compensation from the Palestinian Authority or the PLO for any notary services that you have performed pursuant to your being on that list?</p> <p>A. No.</p> <p>Q. Has anyone ever contacted you to ask that you notarize a document on behalf of the Palestinian</p>	<p style="text-align: right;">Page 45</p> <p>F. ATEYEH</p> <p>A. I don't know -- I cannot -- I don't know.</p> <p>MR. WICK: Elizabeth, could we take this down and put up Tab 9, please.</p> <p>(Whereupon, Tab 9 was marked as Exhibit 3 for identification, as of April 8th, 2021.)</p> <p>MR. WICK: Great.</p> <p>Q. Mr. Ateyeh, I am showing you a document that you produced to us, as well as a Certified English translation of that document that we've had done. This is -- the first page is labeled FA001-T, which is the first page of the English translation, but lets just scroll through the pages very quick.</p> <p>MR. WICK: Elizabeth. So, that everybody could see the full document, slow down. Go back to the -- that's FA002-T, which is the second page of the English translation, and then after that, we have the translator Certification, keep going, and then below that, we have the original document that you produced to us, Bates stamped FA001 and the last page, I believe, is FA002.</p> <p>Q. Mr. Ateyeh, at least with respect to the last two pages of this documents, do you recognize the document as a document that you produced to us?</p> <p>A. Yes.</p>

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<p style="text-align: right;">Page 46</p> <p style="text-align: center;">F. ATEYEH</p> <p>1 Q. And could you please describe what this</p> <p>2 document is.</p> <p>3 A. So, this is a Power of Attorney specific</p> <p>4 that cannot be changed, meaning that this Power of</p> <p>5 Attorney can only be used specifically to sell a</p> <p>6 land.</p> <p>7 MR. WICK: Okay. And I actually stop, and</p> <p>8 ask a process question now, because I realize we</p> <p>9 have not talked about marking these exhibits, and</p> <p>10 I ask Ms. Ianazzi, what's your procedure for that?</p> <p>11 Do we send these? Okay. Thank you.</p> <p>12 Q. And this is a document, Mr. Ateyeh, that</p> <p>13 you notarized, correct?</p> <p>14 A. Yes.</p> <p>15 Q. In fact, that is your seal in the bottom</p> <p>16 right-hand corner of the page numbered FA002,</p> <p>17 correct?</p> <p>18 A. Yes.</p> <p>19 Q. And can you describe the seals in the</p> <p>20 lower left-hand corner; what are those?</p> <p>21 A. There are three seals. Which one are you</p> <p>22 referring to?</p> <p>23 Q. Well, I see two seals. Let me step back</p> <p>24 here. Let's start with the -- the large rectangle,</p> <p>25</p>	<p style="text-align: right;">Page 48</p> <p style="text-align: center;">F. ATEYEH</p> <p>1 signing the Power of Attorney.</p> <p>2 Q. And was he affiliated with the Palestinian</p> <p>3 Authority or the PLO?</p> <p>4 A. I know that he works in the Embassy. What</p> <p>5 is his rank, what is his duty, I don't know.</p> <p>6 Q. And by the Embassy, are you referring to</p> <p>7 the Palestinian Embassy in Mexico?</p> <p>8 A. Yes, sir.</p> <p>9 Q. And so did you send this document to him</p> <p>10 after you notarized it?</p> <p>11 A. Yes, sir.</p> <p>12 Q. And he then returned it to you with a</p> <p>13 stamp?</p> <p>14 A. Yes, sir.</p> <p>15 Q. It'll be just a moment, please. I'm</p> <p>16 trying to make this go as quickly as I can. Okay.</p> <p>17 MR. WICK: Could we go to Tab 10, please.</p> <p>18 (Whereupon, Tab 10 was marked as Exhibit 4</p> <p>19 for identification, as of April 8th, 2021.)</p> <p>20 Q. And, again, we'll just look through this</p> <p>21 quickly. This is similar to what we just looked at</p> <p>22 add at in the -- an English translation of the</p> <p>23 document, similar to the document produced. It's --</p> <p>24 if we'll just walk through it quickly. If we could</p> <p>25</p>
<p style="text-align: right;">Page 47</p> <p style="text-align: center;">F. ATEYEH</p> <p>1 which is the top of the seals, right next to the</p> <p>2 redacted box; do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. All right. And can you describe what seal</p> <p>5 that is?</p> <p>6 A. Can you enlarge it more, so that I will be</p> <p>7 able to view it better?</p> <p>8 MR. WICK: Can you do that, Elizabeth?</p> <p>9 A. I can see it now better.</p> <p>10 Q. Great. Can you explain what that seal is?</p> <p>11 A. It said that the Special Palestinian</p> <p>12 Mission in Mexico are not responsible for the</p> <p>13 content of this document, but we organize, and we</p> <p>14 did the seal, and the stamp of the Notary Public,</p> <p>15 Mr. Fuad Ateyeh.</p> <p>16 Q. And I see the name of, "Riyad Alhalabi,"</p> <p>17 on the page; do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. And do you know who that is?</p> <p>20 A. Over the phone.</p> <p>21 Q. I'm sorry?</p> <p>22 A. I know him over the phone.</p> <p>23 Q. Okay. Who is he?</p> <p>24 A. He is the person who is responsible for</p> <p>25</p>	<p style="text-align: right;">Page 49</p> <p style="text-align: center;">F. ATEYEH</p> <p>1 go to the first page, please.</p> <p>2 Again, English translation that we</p> <p>3 numbered FA0013-T. The next page, the translator</p> <p>4 Certification coversheet, and then the Certification</p> <p>5 follows that, and then the page after that has a</p> <p>6 coversheet titled, "Original," then we have a</p> <p>7 document Bates numbered FA0013 that came from your</p> <p>8 production, Mr. Ateyeh, and I would ask again, do</p> <p>9 you recognize this page, FA0013, as a copy of a</p> <p>10 document you produced to us?</p> <p>11 A. Yes.</p> <p>12 Q. And is this another example of a Power of</p> <p>13 Attorney that you notarized for a client?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Let's see. And can you tell from</p> <p>16 the document when you notarized the document?</p> <p>17 MR. WICK: Can you scroll up, please,</p> <p>18 Elizabeth, or scroll down, actually, to the bottom</p> <p>19 of the page.</p> <p>20 Actually, the date appears to be cut off</p> <p>21 of the page. Do any of the other Seals on the</p> <p>22 page give you an indication of when this occurred,</p> <p>23 of when you notarized the document?</p> <p>24 A. Yes.</p> <p>25</p>

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<p style="text-align: right;">Page 50</p> <p>F. ATEYEH</p> <p>Q. And what do the other Seals tell you about when this occurred?</p> <p>A. I think it's August 18, 2020.</p> <p>Q. Okay. And that's the date of Mr. Alhalabi's seal, correct?</p> <p>A. No, it was sealed or stamped after two weeks, on August 31st.</p> <p>Q. Okay. And so you would have notarized it about two weeks before that?</p> <p>A. Correct.</p> <p>Q. And is this another example of a document that you notarized and sent to the Palestinian Embassy in Mexico?</p> <p>A. Yes.</p> <p>Q. And were you in the United States when you notarized this document?</p> <p>A. Yes.</p> <p>Q. Approximately, how many documents in the last year have you notarized and sent to Palestinian embassies outside the United States?</p> <p>MR. PAIK: Object to the form of the question; assumes facts not in evidence to the use of the word plural.</p> <p>A. It's very hard to estimate. I don't know</p>	<p style="text-align: right;">Page 52</p> <p>F. ATEYEH</p> <p>Q. Okay. Since January 4th of 2020, have you notarized any documents, and sent them to the Palestinian United Nations Mission in the United States?</p> <p>A. No.</p> <p>Q. Have you notarized any documents and sent them to any office of the Palestinian Authority or the PLO in the United States?</p> <p>A. No.</p> <p>MR. WICK: Can we go to Tab 8, please. (Whereupon, Tab 8 was marked as Exhibit 5 for identification, as of April 8th, 2021.)</p> <p>Q. So, Tab 8, Mr. Ateyeh is three pages from your production to us that we just received, I believe the day before yesterday.</p> <p>MR. WICK: And, again, if we could, Elizabeth, if you could scroll through, I believe the first three pages are translated pages labeled FA0131 -- excuse me. Slow down. Go back to the first Page 3, FA0130-T. The second is an English translation, FA0131-T. Next page. Next one is a -- is a translation page labeled FA0132-T. Next page, then the next page.</p> <p>We have our translation Certification and</p>
<p style="text-align: right;">Page 51</p> <p>F. ATEYEH</p> <p>exactly how many.</p> <p>Q. Do you think it's more than ten?</p> <p>A. Definitely; yes.</p> <p>Q. Do you think it's more than 20?</p> <p>A. I don't think so.</p> <p>Q. Okay. And have you notarized and sent any documents in the last year to Palestinian embassies in countries -- in Mexico?</p> <p>A. From which date to which date?</p> <p>Q. What is today? April 8th, 2020, to April 8th, 2021?</p> <p>A. Yes.</p> <p>Q. Which other countries have you sent -- excuse.</p> <p>Me. Which other Palestinian embassies have you sent such documents to?</p> <p>A. Canada.</p> <p>Q. In any other embassies, besides Canada and Mexico, during that timeframe?</p> <p>A. No.</p> <p>Q. And if I take that time-period back a little bit further to January 4th of 2020, would your answer change?</p> <p>A. I don't -- I really don't know.</p>	<p style="text-align: right;">Page 53</p> <p>F. ATEYEH</p> <p>the next page, we -- one more page down. We have from your production a page labeled FA -- excuse me, 0131, then the next page FA0131, and the page after that, FA0132.</p> <p>So, if we could scroll up to two pages up to FA0130.</p> <p>Q. And I would ask you, Mr. Ateyeh, if you recognize this document?</p> <p>A. Yes.</p> <p>Q. What is it?</p> <p>MR. WICK: I need you to answer in Arabic, please.</p> <p>A. So, when we send the Power of Attorney to the Embassy of the lands, or the -- of lands, I put their email on it, and my email, and a copy of the Power of Attorney, and I send it to them.</p> <p>Q. Let me ask it this way. This is an email sent by you, correct?</p> <p>A. Yes.</p> <p>Q. And, I'm sorry, and you sent it to an email address, "palus@mfae.gov.ps," correct?</p> <p>A. Yes.</p> <p>Q. Whose email is that?</p> <p>A. It's either Department of Land, or it's</p>

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<p style="text-align: right;">Page 54</p> <p>1 F. ATEYEH</p> <p>2 the division where they notarize the Power of</p> <p>3 Attorneys.</p> <p>4 MR. PAIK: Well, don't guess. If you</p> <p>5 know, but don't guess.</p> <p>6 Q. Is it your understanding that the email</p> <p>7 address belongs to some office of the Palestinian</p> <p>8 Authority or the PLO?</p> <p>9 A. What I know is it belongs to one of the</p> <p>10 Palestinian departments.</p> <p>11 Q. And did you send this email to this</p> <p>12 address because one of your notary clients asked you</p> <p>13 to do so?</p> <p>14 A. Yes.</p> <p>15 Q. And this email is dated February 3rd,</p> <p>16 2021, correct?</p> <p>17 A. Yes.</p> <p>18 Q. And this email had an attachment to it,</p> <p>19 correct?</p> <p>20 A. Yes.</p> <p>21 Q. Do you know what the attachment was?</p> <p>22 A. It's a Power of Attorney, specific Power</p> <p>23 of Attorney that cannot be used for our purposes.</p> <p>24 Q. And was that attachment produced to us as</p> <p>25 part of your earlier production?</p>	<p style="text-align: right;">Page 56</p> <p>1 F. ATEYEH</p> <p>2 A. Yes, sir.</p> <p>3 Q. And you sent that document at the request</p> <p>4 of your client?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Okay. And was the attachment of this</p> <p>7 document produced as part of your earlier</p> <p>8 production?</p> <p>9 A. Yes.</p> <p>10 Q. Okay.</p> <p>11 MR. WICK: And can we scroll down to one</p> <p>12 more page, please, to the document labeled at the</p> <p>13 bottom, "FA0132."</p> <p>14 Q. This document is an email from you dated</p> <p>15 August 24th, 2020, correct?</p> <p>16 A. Yes, sir.</p> <p>17 Q. And is there another email to the</p> <p>18 Palestinian Department of Lands?</p> <p>19 A. Yes, sir.</p> <p>20 Q. And is this another example of a Power of</p> <p>21 Attorney that you sent to the Department of Lands at</p> <p>22 the request of your client after notarizing it?</p> <p>23 A. Yes, sir.</p> <p>24 Q. And I note that only part of the subject</p> <p>25 line here is redacted --</p>
<p style="text-align: right;">Page 55</p> <p>1 F. ATEYEH</p> <p>2 THE INTERPRETER: I'm sorry, I'll ask him</p> <p>3 to --</p> <p>4 A. Of course. I have sent it to you.</p> <p>5 Q. Okay. And there is a portion of the</p> <p>6 subject line of the email that has been redacted or</p> <p>7 blacked out; why was that done?</p> <p>8 MR. PAIK: Well, can I answer that, or --</p> <p>9 I mean, we are the ones that did the</p> <p>10 redaction. It's just redacted personal</p> <p>11 information, identified first as I stated in the</p> <p>12 letter I sent to you.</p> <p>13 MR. WICK: Okay.</p> <p>14 Q. Let's go to the next page. The next page</p> <p>15 is FA0131, and it appears to be an email from you to</p> <p>16 the email address, "palus@mofa.pna.ps," dated</p> <p>17 September 11th, 2020, correct?</p> <p>18 A. Yes, sir.</p> <p>19 Q. And who did you send this document to?</p> <p>20 A. It's the same email, but I usually send</p> <p>21 documents to it. The email for the Department of</p> <p>22 Lands.</p> <p>23 Q. And is this another situation where you</p> <p>24 notarized a Power of Attorney for a client and sent</p> <p>25 it to the Department of Lands in Palestine?</p>	<p style="text-align: right;">Page 57</p> <p>1 F. ATEYEH</p> <p>2 MR. WICK: And, Elizabeth, if you could</p> <p>3 please scroll up to the translation of this page,</p> <p>4 FA132-T. The portion before the redacted is</p> <p>5 translated as, "Agency," in the subject line, and</p> <p>6 the portion of the redaction after the translation</p> <p>7 is, "I will send it to Mexico."</p> <p>8 Q. And my question for you is, is the</p> <p>9 redacted portion the name of the agency?</p> <p>10 A. When I send it, I send it to Mexico, so</p> <p>11 that it doesn't get mixed up between Mexico and</p> <p>12 Canada.</p> <p>13 Q. My question -- before I ask the question</p> <p>14 again --</p> <p>15 MR. WICK: Elizabeth, would you please</p> <p>16 scroll down to the original version, the last</p> <p>17 page.</p> <p>18 Q. My question is, is the redacted portion of</p> <p>19 this document in the subject line the name of a</p> <p>20 client or is it the name of an agency?</p> <p>21 A. The client's name.</p> <p>22 Q. Thank you.</p> <p>23 MR. PAIK: Let me put on the record my</p> <p>24 objection. Your translation is inaccurate.</p> <p>25 "Agency," is not the word. It's, "Power of</p>

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<p style="text-align: right;">Page 58</p> <p>1 F. ATEYEH</p> <p>2 Attorney."</p> <p>3 THE INTERPRETER: I'm sorry, this is the</p> <p>4 interpreter. Your question is asking about, is it</p> <p>5 the entity, not the -- is it sent to the office</p> <p>6 there, right? I meant by agency is the office,</p> <p>7 not the document itself.</p> <p>8 MR. PAIK: I'm not quibbling with your</p> <p>9 translation. I'm talking about the documents, the</p> <p>10 way that the document translator translated the</p> <p>11 Arabic language led to the mistaken language</p> <p>12 premised on the notion that this is some agency of</p> <p>13 government as opposed to the word being Power of</p> <p>14 Attorney.</p> <p>15 THE INTERPRETER: Thank you, sir.</p> <p>16 MR. WICK: Could we go to Tab 1, please.</p> <p>17 (Whereupon, Tab 1 was marked as Exhibit 6 for</p> <p>18 identification, as of April 8th, 2021.)</p> <p>19 Q. Mr. Ateyeh, what we're showing you now is</p> <p>20 the other Subpoena that we had received on you,</p> <p>21 which is a Subpoena committing you to produce</p> <p>22 documents. You've seen this Subpoena before,</p> <p>23 correct?</p> <p>24 A. Yes.</p> <p>25 Q. I know that you produced some documents in</p>	<p style="text-align: right;">Page 60</p> <p>1 F. ATEYEH</p> <p>2 such communications?</p> <p>3 A. Yes, I did.</p> <p>4 Q. And these would include the documents that</p> <p>5 you -- that you produced regarding communications</p> <p>6 with various offices and agents to whom you sent</p> <p>7 notarized documents, correct?</p> <p>8 MR. PAIK: Objection, this question is</p> <p>9 misleading, given the legal conclusion request</p> <p>10 stated in Request 1.</p> <p>11 Q. You may answer.</p> <p>12 A. Yes.</p> <p>13 Q. All right. Have you ever had any</p> <p>14 communications with any employee, agent,</p> <p>15 representative, or anybody else acting on behalf of</p> <p>16 the Palestinian Authority, or the PLO, since</p> <p>17 October 1st, 2019, other than sending and receiving</p> <p>18 documents on behalf of your notary clients?</p> <p>19 MR. PAIK: Objection, the question is</p> <p>20 misleading and ambiguous. On whose behalf is</p> <p>21 acting in your question?</p> <p>22 Q. You may answer.</p> <p>23 A. No.</p> <p>24 Q. Okay. Give me just a moment, please.</p> <p>25 MR. WICK: We can take the document down,</p>
<p style="text-align: right;">Page 59</p> <p>1 F. ATEYEH</p> <p>2 response to this the Subpoena, and I would just like</p> <p>3 to ask you what you did to search for the documents</p> <p>4 that were responsive to our Subpoena?</p> <p>5 A. I tried to fulfill all of your requests.</p> <p>6 I searched everything I have, and whatever I was</p> <p>7 able to find, I did send it to you.</p> <p>8 Q. Where specifically did you look?</p> <p>9 A. I searched in my office, if I have any</p> <p>10 documents, and I searched my phone, if there was any</p> <p>11 documents, and that's -- this is where I keep my</p> <p>12 documents.</p> <p>13 MR. WICK: Elizabeth, would you scroll</p> <p>14 down to the next page, and the next page, and the</p> <p>15 page after that, and one more page, one more, keep</p> <p>16 going. Let's get -- I want to get to the</p> <p>17 Substantive Request. Keep going. There we go.</p> <p>18 Q. So, I just want to go through this very</p> <p>19 quickly with you, Mr. Ateyeh.</p> <p>20 The first Request asks for all</p> <p>21 communications between you and an employee, agent,</p> <p>22 representative, or other person acting on behalf of,</p> <p>23 or for the benefit of a Defendant, that being the</p> <p>24 Palestinian Authority, or the PLO, on or after</p> <p>25 October 1st, 2019, and to be clear, did you find any</p>	<p style="text-align: right;">Page 61</p> <p>1 F. ATEYEH</p> <p>2 Elizabeth.</p> <p>3 Q. Mr. Ateyeh, are you familiar with an</p> <p>4 entity called the Palestinian National Council?</p> <p>5 A. Yes.</p> <p>6 Q. And what is the Palestinian National</p> <p>7 Council?</p> <p>8 A. It's like a Parliament -- I'm sorry. It's</p> <p>9 like the Palestinian Parliament; yes.</p> <p>10 Q. Okay. It's like the Palestinian</p> <p>11 Parliament. Okay. Have you ever been a member of</p> <p>12 the Palestinian National Council?</p> <p>13 A. Yes.</p> <p>14 Q. During what time-period?</p> <p>15 A. In the beginning of the -- 2000, but I</p> <p>16 cannot give you a specific date.</p> <p>17 Q. Are you currently a member of the</p> <p>18 Palestinian National Council?</p> <p>19 A. No.</p> <p>20 Q. When did you stop being a member of the</p> <p>21 Palestinian National Council?</p> <p>22 A. Five years, six years.</p> <p>23 Q. Five or six years ago?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Have you done any work relating to the</p>

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<p style="text-align: right;">Page 62</p> <p>1 F. ATEYEH</p> <p>2 Palestinian National Council since January 4th of</p> <p>3 2020?</p> <p>4 A. No.</p> <p>5 Q. Since January 4th, 2020, have you done any</p> <p>6 other work, or been a part of any other</p> <p>7 organizations affiliated with the Palestinian</p> <p>8 National Counsel, or the PLO?</p> <p>9 A. No.</p> <p>10 MR. PAIK: Can I ask, we're -- it's</p> <p>11 actually three hours behind. So, it's getting</p> <p>12 almost to lunchtime. Are you almost done because</p> <p>13 if you are, we could just plow through and get</p> <p>14 through it.</p> <p>15 MR. WICK: Yes, I have about another ten</p> <p>16 to 15 minutes to make sure I got everything, and</p> <p>17 then I'll wrap up.</p> <p>18 MR. PAIK: Great.</p> <p>19 MR. BERGER: And I'll have a few questions</p> <p>20 as well, of course.</p> <p>21 MR. WICK: Okay.</p> <p>22 Q. Have you ever had any interactions, since</p> <p>23 January 4th of 2020, with anybody affiliated with</p> <p>24 the Palestinian Authority, or the PLO in the United</p> <p>25 States?</p>	<p style="text-align: right;">Page 64</p> <p>1 F. ATEYEH</p> <p>2 that list of individuals, and I'm going to ask you,</p> <p>3 do you know any of them?</p> <p>4 Okay. Any others?</p> <p>5 A. Nadya Rasheed, I recognize her name.</p> <p>6 Q. Any others?</p> <p>7 A. No, that's it.</p> <p>8 Q. Okay. Let's start with --</p> <p>9 To be clear, so it was two names, correct,</p> <p>10 Mr. Mansour and Ms. Rasheed?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. How do you know Mr. Mansour?</p> <p>13 A. He's the Ambassador of Palestinian to the</p> <p>14 United Nations, and he's always on TV. He's a</p> <p>15 permanent figure that everybody knows.</p> <p>16 Q. But do you know him personally?</p> <p>17 A. Yes.</p> <p>18 Q. And for how long have you known him?</p> <p>19 A. So, I knew him since his brother died</p> <p>20 about five or six years ago. His brother died in</p> <p>21 San Francisco, and he attended the funeral ceremony,</p> <p>22 and we went to the Palestinian services.</p> <p>23 Q. When was the last time that you spoke with</p> <p>24 him?</p> <p>25 A. I don't know if we have ever spoken.</p>
<p style="text-align: right;">Page 63</p> <p>1 F. ATEYEH</p> <p>2 A. No.</p> <p>3 Q. And during that same time-period, since</p> <p>4 January 4th of 2020, have you attended any events</p> <p>5 held or sponsored by the Palestinian Authority or</p> <p>6 the PLO in the United States?</p> <p>7 A. No.</p> <p>8 Q. Have you ever been to the -- to the UN</p> <p>9 Mission of the PLO in New York?</p> <p>10 A. No.</p> <p>11 MR. WICK: Can we put up Tab 5, please,</p> <p>12 and can we scroll in on a little bit more closely,</p> <p>13 zoom in a little more closely on that, so we can</p> <p>14 read some of the names.</p> <p>15 (Whereupon, Tab 5 was marked as Exhibit 7 for</p> <p>16 identification, as of April 8th, 2021.)</p> <p>17 THE INTERPRETER: I can't read that.</p> <p>18 MR. WICK: We're trying to read that.</p> <p>19 Q. Mr. Ateyeh, this is a page taken from the</p> <p>20 Permanent Observer Mission from the Palestinian to</p> <p>21 the United Nations, and there's a list of</p> <p>22 individuals on that page described as the Mission</p> <p>23 Team; do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. And I would like you to take a look at</p>	<p style="text-align: right;">Page 65</p> <p>1 F. ATEYEH</p> <p>2 Q. Okay. Have you emailed with him in the</p> <p>3 last year?</p> <p>4 A. No.</p> <p>5 Q. All right. So, you don't have any</p> <p>6 personal friendship or relationship with him,</p> <p>7 correct?</p> <p>8 A. No.</p> <p>9 Q. Okay. I'm sorry, I need to be clear on</p> <p>10 the answer because I said, "correct?"</p> <p>11 Do you have a personal friendship or</p> <p>12 relationship with Mr. Mansour?</p> <p>13 A. No.</p> <p>14 Q. Okay. And what about Ms. Rasheed; do you</p> <p>15 know her personally?</p> <p>16 A. Yes.</p> <p>17 Q. And how do you know her?</p> <p>18 MR. WICK: In Arabic, please.</p> <p>19 A. Her father is one of her -- my close</p> <p>20 friends, and we live together in San Francisco area.</p> <p>21 Q. When was the last time you spoke with her?</p> <p>22 A. I've never have spoken with her.</p> <p>23 Q. So, when you said you're close friends,</p> <p>24 you're referring to her father, not to Ms. Rasheed</p> <p>25 herself?</p>

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<p style="text-align: right;">Page 66</p> <p>F. ATEYEH</p> <p>A. Correct.</p> <p>Q. Okay. And are you aware of --</p> <p>Other than the UN Mission in New York, are you aware of any other offices or facilities owned or occupied by the PLO or the Palestinian Authority in the United States?</p> <p>A. No.</p> <p>Q. Are you aware of anybody who works for the PLO or the Palestinian Authority in the United States, other than through the UN Mission?</p> <p>A. No.</p> <p>Q. And are you aware of anybody who receives payment for the Palestinian Authority -- excuse me.</p> <p>Are you aware of anybody who receives payment from the Palestinian Authority or the PLO for performing notary services in the United States?</p> <p>A. No.</p> <p>MR. WICK: If I can take a five-minute break, I think I'm probably done, but can we go off the record for a moment?</p> <p>THE VIDEOGRAPHER: Okay. We're now off the record. The time is 19:00 UTC Time.</p> <p>(Whereupon, a short recess was taken.)</p> <p>THE VIDEOGRAPHER: We are now back on the</p>	<p style="text-align: right;">Page 68</p> <p>F. ATEYEH</p> <p>EXAMINATION BY</p> <p>MR. BERGER:</p> <p>Q. Good afternoon, how are you? My name is Mitchell Berger. I am one of the lawyers for the Defendants, Palestinian Authority and Palestinian Liberation Organization; have we ever met before?</p> <p>A. No.</p> <p>Q. We looked at two documents, Exhibits 3 and Exhibit 4. We looked at those documents; do you recall those documents?</p> <p>A. I don't know what's Exhibit 3 and what's Exhibit 4, but all the documents you have presented, they came from me.</p> <p>Q. Right. Thank you. When you notarize documents, did you do so as a service to your notary client?</p> <p>A. Yes.</p> <p>Q. Did you do so as a service to the Palestinian Authority?</p> <p>A. No.</p> <p>Q. Did you do so as a service to the Palestinian Liberation Organization?</p> <p>A. No.</p> <p>Q. We looked at some emails that you sent to</p>
<p style="text-align: right;">Page 67</p> <p>F. ATEYEH</p> <p>record. The time is 19:10 UTC Time.</p> <p>Q. Mr. Ateyeh, I just have one more question for you. Earlier in the deposition, you spoke about a practice, when the PLO's Washington, D.C. office was open, of periodically sending notarized documents to that office and receiving them back; do you recall that?</p> <p>A. Yes.</p> <p>Q. Since the Washington, D.C. office closed, is there -- is there another office of the, either the Palestinian Authority, or the PLO, that is -- performed a similar function in the United States, than what the Washington, D.C. performed?</p> <p>MR. PAIK: Object to the form of the question; it's misleading and contains a legal conclusion.</p> <p>A. No.</p> <p>MR. WICK: Okay. I thank you very much for your time and your patience today, and I don't have any further questions for you, but I believe my friend Mr. Berger does.</p> <p>MR. BERGER: Thank you.</p>	<p style="text-align: right;">Page 69</p> <p>F. ATEYEH</p> <p>the Ministry of Lands in Ramallah; do you recall that?</p> <p>A. If you don't mind repeating the questions.</p> <p>Q. Sure. Do you recall, we looked at some emails that Mr. Wick asked you about?</p> <p>A. Yes.</p> <p>Q. When you sent those emails, did you send them as a service for your notary client?</p> <p>A. Yes.</p> <p>Q. Did you send those emails as a service on behalf of the Palestinian Authority?</p> <p>A. No.</p> <p>Q. Did you send those as a service on behalf of the Palestinian Liberation Organization?</p> <p>A. No.</p> <p>Q. Since January 4 of 2020, have you provided any services on behalf of the Palestinian Authority?</p> <p>A. No.</p> <p>Q. Since January 4, 2020, have you provided any services on behalf of the Palestinian Liberation Organization?</p> <p>A. No.</p> <p>MR. BERGER: Thank you, Mr. Ateyeh. Those are all the questions that I have.</p>

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<p style="text-align: right;">Page 70</p> <p>1</p> <p>2 THE WITNESS: Thank you.</p> <p>3 MR. WICK: Thank you very much.</p> <p>4 THE VIDEOGRAPHER: Everyone agree to go</p> <p>5 off the record? Okay.</p> <p>6 MR. PAIK: Yes.</p> <p>7 THE VIDEOGRAPHER: The time is now 19:17</p> <p>8 UTC. We are off the record, and this concludes</p> <p>9 today's testimony by Fuad Ateyeh. Thank you,</p> <p>10 everyone. Have a great day.</p> <p>11 -o0o-</p> <p>12 (Whereupon, the examination of FUAD ATEYEH</p> <p>13 was concluded at 5:17 p.m.)</p> <p>14</p> <p>15</p> <p>16 _____</p> <p>17 FUAD ATEYEH</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 72</p> <p>1 Errata Sheet</p> <p>2</p> <p>3 NAME OF CASE: SHAETAI SCOTT SHATSKY -against- PALESTINE LIBERATION ORGANIZATION</p> <p>4 DATE OF DEPOSITION: 04/08/2021</p> <p>5 NAME OF WITNESS: Fuad Ateyeh</p> <p>6 Reason Codes:</p> <p>7 1. To clarify the record.</p> <p>8 2. To conform to the facts.</p> <p>9 3. To correct transcription errors.</p> <p>10 Page ____ Line ____ Reason ____</p> <p>11 From ____ to ____</p> <p>12 Page ____ Line ____ Reason ____</p> <p>13 From ____ to ____</p> <p>14 Page ____ Line ____ Reason ____</p> <p>15 From ____ to ____</p> <p>16 Page ____ Line ____ Reason ____</p> <p>17 From ____ to ____</p> <p>18 Page ____ Line ____ Reason ____</p> <p>19 From ____ to ____</p> <p>20 Page ____ Line ____ Reason ____</p> <p>21 From ____ to ____</p> <p>22 Page ____ Line ____ Reason ____</p> <p>23 From ____ to ____</p> <p>24</p> <p>25 _____</p>
<p style="text-align: right;">Page 71</p> <p>1</p> <p>2 C E R T I F I C A T E</p> <p>3</p> <p>4 I, AMBRIA IANAZZI, do hereby Certify:</p> <p>5 THAT FUAD ATEYEH, the WITNESS herein, was</p> <p>6 sworn under penalty of perjury by a Notary Public.</p> <p>7</p> <p>8 THAT the deposition transcript herein is a</p> <p>9 verbatim record of the testimony given by FUAD</p> <p>10 ATEYEH, stenographically record by a Registered</p> <p>11 Professional Reporter, and Certified Realtime</p> <p>12 Reporter.</p> <p>13</p> <p>14 THAT I am not related to any of the Parties</p> <p>15 to this Action by blood or marriage; and I have no</p> <p>16 interest, financial or otherwise, in the outcome of</p> <p>17 the case.</p> <p>18</p> <p>19</p> <p>20 CERTIFICATION DATE: April 13th, 2021.</p> <p>21</p> <p>22</p> <p>23 _____</p> <p>24 AMBRIA IANAZZI, RPR, CRR, RCR, CSR</p> <p>25</p>	

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